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CENTRAL FAX CENTER**PATENT**
C4-971A**NOV 30 2006****Remarks**

Claims 28-54 are pending in this application. Claims 28-54 are rejected. No new matter has been added. It is respectfully submitted that the pending claims define allowable subject matter.

Claims 35-39 and 50-54 have been objected to as depending from a claim that includes the recitation "consisting." Applicants have amended claims 34 and 49 to remove the "consisting" recitation. Accordingly, claims 35-39 and 50-54 no longer depend from a claim including the recitation "consisting" and Applicants submit that the objection has been overcome.

Claims 28-30 and 40-45 have been rejected under 35 U.S.C. § 102(e) as being anticipated by Randall (U.S. Patent 6,727,938). Applicants respectfully traverse the under 35 U.S.C. § 102(e) rejection.

Randall describes a security system with maskable motion detection in select sub-areas within a selected field of view (abstract). In particular, a motion detector 130 includes an optional mask feature such that if certain areas of the camera's field of view are expected to contain motion for which alerts are not desired, these areas can be masked, or blocked, from the motion detection process (column 4, lines 59-63). In operation, the pixels of a video image corresponding to the masked region are blocked (column 4, line 66 to column 5, line 3). The masking is performed by selecting segments of the video image for blocking using some type of user input device to thereby create a mask overlay (column 7, lines 4-6).

Claim 28 recites a method for defining a control zone in a field of view of a motion video camera comprising "receiving indication of a selected region within the tracking zone having a selectable control zone type." Randall fails to describe or suggest such a method.

The system of Randall allows a user to select a region within an image to be masked from processing. Specifically, the masked region is blocked from motion detection such that none of the image pixels in that region are processed to determine whether a motion alert should be issued. However, although a user is able to select the region to mask, such as by selecting a mask overlay region, there is no possibility for selection of a control zone type as

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recited in claim 28. The system of Randall only allows a user to select a region to be blocked from processing. It does not also give the user the option to select the type of processing to be performed by characterizing the masked region as a particular type. The region is simply blocked from processing.

In contrast, claim 28 recites receiving indication of a selected region within the tracking zone that also includes a selectable control zone type, for example, tracking, black-out, exclusion, entry and privacy. This type of selectable operation is simply not described or suggested in Randall. Although this mask essentially defines a region that is not monitored (i.e., within the mask) and a region to be monitored (i.e., outside the mask), there is simply no way to select a region within the tracking zone and then also select a control zone type within that region. Accordingly, although the system of Randall allows selection of regions with a field of view that determine different processing to be performed within the field of view, such as blocked in the masked overlay regions and monitored in the non-masked, the system does also not allow different control types within the each of the selected regions. The selected regions are blocked and there are no other operations that can be performed within these regions. Thus, Randall does not describe or suggest a method as recited in claim 28.

Claims 29 and 30 depend from independent claim 28. When the recitations of claims 29 and 30 are considered in combination with the recitations of claim 28, Applicants submit that dependent claims 29 and 30 are likewise patentable over Randall for at least the same reasons set forth above.

Claim 40 recites a system for defining control zones of different types in a field of view of a motion video camera comprising "means for defining a plurality of control zones in a selected area of the field of view of the motion video camera, said control zones being of a type selected from said plurality of control zone types in said database and defining a tracking behavior for the control zone" Randall fails to describe or suggest such a system.

As described above with respect to claim 28, although within the field of view masked regions may be defined where processing, namely monitoring, is blocked, and regions within the field of view outside the masked regions monitoring is performed, there is simply no description or suggestion of defining different type of regions. The regions are only masked

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regions that block the monitoring. The system of Randall does not allow control zones within the field of view each having a different tracking behavior. The tracking behavior within each of the masked regions is the same, namely, blocking of monitoring. Thus, Randall does not describe or suggest a system as recited in claim 40.

Claims 41 and 42 depend from independent claim 40. When the recitations of claims 41 and 42 are considered in combination with the recitations of claim 40, Applicants submit that dependent claims 41 and 42 are likewise patentable over Randall for at least the same reasons set forth above.

Claim 43 recites a computer readable medium having stored thereon computer-executable instructions for defining a control zone in a field of view of a motion video camera performing the steps comprising "receiving indication of a selected region within the tracking zone having a selectable control zone type." Randall fails to describe or suggest such a computer readable medium. As discussed in more detail above with respect to claim 28, Randall simply does not describe or suggest a system allowing selectable control zones within a tracking zone within a field of view. Thus, Randall does not describe or suggest a computer readable medium as recited in claim 43.

Claims 44 and 45 depend from independent claim 43. When the recitations of claims 44 and 45 are considered in combination with the recitations of claim 43, Applicants submit that dependent claims 44 and 45 are likewise patentable over Randall for at least the same reasons set forth above.

Claims 31-39 and 46-54 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Randall in view of Kageyama (U.S. Patent 5,552,823). Applicants respectfully traverse the under 35 U.S.C. § 103(a) rejection.

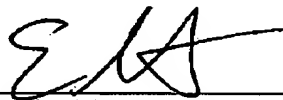
Claims 31-39 depend from independent claim 28 and claims 46-54 depend from independent claim 43. When the recitations of claims 31-39 and 46-54 are considered in combination with the recitations of claims 28 and 43, respectively, Applicants submit that dependent claims 31-39 and 46-54 are likewise patentable over Randall for at least the same

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reasons set forth above. Even from a cursory reading of Kageyama, this reference fails to make up for the deficiencies in the Randall reference.

Accordingly, in view of the foregoing amendments and remarks, it is respectfully submitted that the prior art fails to teach or suggest the claimed invention and all of the pending claims in this application are believed to be in condition for allowance. Reconsideration and favorable action is respectfully solicited. Should anything remain in order to place the present application in condition for allowance, the Examiner is kindly invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,



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